

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-mj-8645-BER**

UNITED STATES OF AMERICA,

V.

GREGORY ALLEN MOORE,

Defendant.

/

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Mills Maynard)?
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)?
3. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023?
4. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024?

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: s/Gregory Schiller  
Gregory Schiller  
Assistant United States Attorney  
Florida Bar No. 0648477  
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West Palm Beach, FL 33401  
Email: gregory.schiller@usdoj.gov

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of Florida**

United States of America	)	
v.	)	
	)	Case No. 24-mj-8645-BER
GREGORY ALLEN MOORE	)	
	)	
	)	

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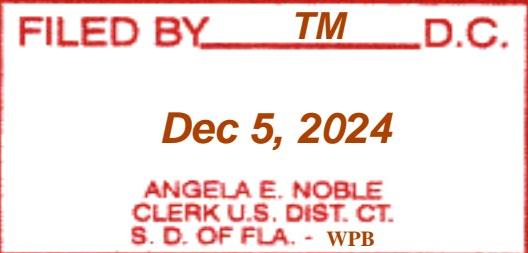
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2024 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(5)(B) & (b)(2)	Possession of Child Pornography



This criminal complaint is based on these facts:

See attached Affidavit incorporated herein by reference sworn to by FBI Special Agent Gennady Julien

Continued on the attached sheet.

*Gennady Julien*  
Complainant's signature

FBI Special Agent Gennady Julien

Printed name and title

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (FaceTime).

*Bruce Reinhart*  
Judge's signature

Date: 12/05/2024

City and state: West Palm Beach, Florida

United States Magistrate Judge Bruce E. Reinhart  
Printed name and title

## AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

### I. AFFIANT'S BACKGROUND

I, Gennady Julien, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 2019 and am currently assigned to Miami Division, Palm Beach County Resident Agency. While employed by the FBI, I have investigated a variety of federal criminal violations, including but not limited to; crimes against children, matters related to child pornography, sexual exploitation of minors and child pornography using facilities of interstate or foreign commerce. Moreover, I am a federal law enforcement officer engaged in enforcing criminal laws of the United States, including 18 U.S.C. §§ 2252 and 2252A, et seq.

2. In this capacity, I have investigated child exploitation and internet crimes against children cases. I have participated in investigations of persons suspected of violating federal obscenity and child pornography laws, including Title 18, United States Code, Sections, 2251, 2252, 2252A and 2422. These investigations have included the use of surveillance techniques, undercover activities, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. In the course of these investigations, I have reviewed still images and videos containing child pornography and images depicting minor children engaged in sexually explicit conduct on a wide variety of forms of electronic media including computers, digital cameras, and wireless telephones, and have discussed and reviewed these materials with other law enforcement officers. I have also participated in training programs for the investigation and enforcement of federal child pornography laws relating to the use of computers for receiving, transmitting, and storing child pornography.

3. Based on the information set forth in this affidavit, there is probable cause to believe that on or about December 5, 2024, GREGORY MOORE knowingly possessed child pornography involving a prepubescent minor or a minor that had not attained 12 years of age, in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

4. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known concerning this investigation. I have included only those facts and circumstances that I believe are sufficient to establish probable cause for the issuance of the requested search warrant.

5. The statements contained in this affidavit are based upon my investigation, information provided by other sworn law enforcement officers and other personnel specially trained in the seizure and analysis of computers and electronic mobile devices and electronic storage devices, and on my experience and training as a federal agent.

#### **PROBABLE CAUSE**

6. On December 5, 2024, the Federal Bureau of Investigation executed a search warrant, case number **24-mj-8637-BER**, at a 4101 San Marino Boulevard, Apartment 105, West Palm Beach, Florida, 33409 (Target Premises). GREGORY MOORE (36 years' old) resided at the residence with his father, his mother, and his adult-aged niece and her infant son.

7. The Target Premises is a two-bedroom, two-bathroom apartment with a living room and kitchen area separating the two bedrooms. When an FBI team initiated the execution of the search warrant, MOORE was in the living room area between the two bedrooms. MOORE had in place a set of blankets and a pillow on the floor of the living room in front of a television set. Located directly adjacent to MOORE's pillow was a white laptop that was connected to a black

external hard drive. The external hard drive bore a taped white piece of paper with the label “Good 5TB”.

8. All residents were removed from the Target Premises and interviewed separately. Both MOORE and his niece reported that MOORE kept shared storage space with the niece in the niece’s bedroom in the northernmost part of the Target Premises. MOORE directed FBI personnel to retrieve his hooded sweatshirt from the closet of niece’s bedroom during his interview.

9. The niece reported that MOORE used the aforementioned laptop recovered from the living room, and that he frequently used external hard drives, which she described as “little black boxes.” The niece advised MOORE stored some of his items in a set of clear plastic drawers under a PlayStation gaming system, which FBI personnel located in the niece’s bedroom. The niece additionally advised that MOORE repeatedly took a bottle of lotion from her room, his laptop with an external hard drive, and locked himself in the bathroom.

10. In the top clear plastic drawer underneath the PlayStation located in the niece’s bedroom, FBI personnel recovered multiple external hard drives matching the description of “little black boxes,” as well as multiple thumb drives. Within the top drawer were also mail items and a covid vaccination card belonging to MOORE. One of the external drives was a black and gray HDD My Passport bearing serial number WXD2D3337C33. The drive additionally bore a taped white piece of paper with the label “Good 4TB”.

11. The laptop and all the recovered thumb drives and external hard drives were encrypted and password protected. MOORE appeared to be running a “tails” operating system on the laptop. The drive labeled “Good 4TB”, however was not encrypted. Within “Good 4TB” FBI personnel recovered approximately one terabyte of files, the overwhelming majority of which appeared to be child pornography or child sexual abuse media (CSAM). The CSAM were filed

and categorized into labeled directories. Directory names included titles such as “Siberian Mouse” (a known search term for CSAM), “Blackmail” and “Orgasm”. Below are three video files found within the “Good 4TB” drive, reviewed at the scene of the search warrant:

- 1) Title: 12 Yo Girl Fuck (2) 21.10.2019 12-26.mp4

Length: 4 minutes and 1 second

Description: Video features what appears to be a twelve-year-old Asian female wearing a blue sweatshirt engaged in vaginal intercourse in the missionary position with an adult male. The video is shot from the point of view perspective of the adult male and focuses predominantly on the repeated thrusting of the adult man’s penis into the child’s vagina.

- 2) Title: 2560o-Brush-Pussy-Wet.mp4

Length: 15 minutes and 37 seconds

Description: Video features what appears to be an eleven-year-old white female. The child begins the video fully clothed, then removes articles of clothing and presents her genitalia to the camera in various positions. The child then began to vaginally penetrate herself with a highlighter. The video focuses on the child’s genitalia and repeated penetration from a variety of camera angles.

- 3) Title: Erika sucking brothers dick hevc.mp4

Length: 20 seconds

Description: Video shows what appears to be a ten-year-old Asian female performing fellatio on a twelve-year-old male. The young girl is visibly nude on her knees sucking on the young boy’s penis. The young boy is only visible from the waist down.

12. Within the “Good 4TB” external hard drive FBI personnel located a directory called “Old Phone”. Within “Old Phone” was a photo titled 20230318\_134634.jpg which was of a laptop screen taken from a cellular telephone. On the laptop screen was a web page for Walmart’s pay stub portal. The portal page displayed the name GREGORY MOORE in bold, showed a date of 3/16/23, the address of the Target Premises, as well as what appeared to be wage or salary payment amounts. FBI personnel located

**CONCLUSION**

13. Based upon the information provided above, I respectfully submit that on or about December 5, 2024, GREGORY MOORE did knowingly possess child pornography involving a prepubescent minor or a minor that had not attained 12 years of age, in violation of 18 U.S.C. § 2252A(a)(5)(b) and (b)(2).

*FURTHER YOUR AFFIANT SAYETH NAUGHT.*

*Gennady Julien*  
\_\_\_\_\_  
Gennady Julien, Special Agent  
Federal Bureau of Investigation

Sworn and Attested to me by Applicant by Telephone (FaceTime) per Fed.R.Crim.P. 4(d)  
and 4.1. on December 5th 2024.

*Bruce Reinhart*  
\_\_\_\_\_  
THE HONORABLE BRUCE E. REINHART  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: GREGORY ALLEN MOORE

Case No: 24-mj-8645-BER

Count #1:

Possession of Child Pornography

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

\* **Max. Term of Imprisonment:** 20 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Max. Supervised Release:** Life (mandatory minimum term of 5 years)

\* **Max. Fine:** \$250,000 fine and a \$5,000 special assessment

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\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 24-mj-8645-BER

**BOND RECOMMENDATION**

DEFENDANT: GREGORY ALLEN MOORE

Pre-Trial Detention  
(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Gregory Schiller  
(AUSA: Gregory Schiller)

Last Known Address: \_\_\_\_\_ ,

West Palm Beach, Florida \_\_\_\_\_

What Facility: \_\_\_\_\_

Agent(s): FBI SPECIAL AGENT GENNADY JULIEN  
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)